

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROGER D. WOOLEYHAN)
Plaintiff,)
v.)
CAPE HENOPEN)
BOARD OF EDUCATION, a/k/a,)
CAPE HENOPEN SCHOOL BOARD,)
GEORGE E. STONE, CAPE)
HENOPEN SCHOOL DISTRICT,)
WILLIAM H. JOPP, JOHN YORE,)
DIANNE MRAZECK, ROBERT)
MAULL, WILLIAM MATT, AMANDA)
JESTER, LISA COVERDALE, and)
JOHN WALSH,)
Defendants,)
)

) CASE NO. 10-153 MMB

) DEMAND FOR JURY TRIAL

**PLAINTIFF ROGER D. WOOLEYHAN'S
MOTION TO FILE THE APPENDIX AND VIDEO EXHIBIT IN SUPPORT OF
PLAINTIFF'S ANSWERING BRIEF UNDER SEAL**

In accordance with the Revised Administrative Procedures governing Filing and Service By Electronic Means (hereinafter "Revised Procedures"), Plaintiff Roger D. Wooleyhan by and through his undersigned counsel moves to file the appendix (hereinafter the "Appendix"), and video exhibit in support of Plaintiff's Answering Brief under Seal, and, in support hereof, states:

1. Plaintiff Roger D. Wooleyhan requests that he be permitted to file the Appendix under seal because it contains documents that have been designated confidential, medical records, a criminal information report, and documents potentially pertaining to minors.

2. Plaintiff Roger D. Wooleyhan requests that he be permitted to file the School Surveillance Video under seal because it contains video footage of the incident at the school, and shows various students on the Cape Henlopen High School's premises. Plaintiff wishes to protect the privacy interests and identity of those students.

3. In accordance with the Revised Procedures, a redacted version of the Appendix will be filed within seven (7) days.

WHEREFORE, Plaintiff Roger D. Wooleyhan respectfully requests that this Honorable Court enter an Order authorizing the filing of the Appendix under seal and granting such other and further relief as this Court deems appropriate.

Respectfully Submitted,

/s/ Stephen P. Norman
Stephen P. Norman, Esquire, Bar No. 4620
The Norman Law Firm
29 Atlantic Avenue, Suite E
Ocean View, Delaware 19970
(302) 537-3788
snorman@thenormanlawfirm.com

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